

Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)
UNIMEX CORPORATION,) Bankruptcy Case
Debtor.) No. 20-12535-BFK
Chapter 11

JOLENE E. WEE, PLAN TRUSTEE OF)
UNIMEX CORPORATION,)
Plaintiff,)
v.) Adversary Proceeding No. 22-01058-BFK
WEIWEI JIAN,)
Defendant.)

NOTICE OF DEFAULT UNDER SETTLEMENT AGREEMENT

Plaintiff, Jolene E. Wee, Plan Trustee (“Trustee”) provides this Notice of Default pursuant to that certain Settlement Agreement among the Trustee, Defendant Weiwei Jian, Buffer Zone, LLC and Gold Creek Properties (collectively, “Jian”) stating to the Court as follows:

1. In March 2024, Jian and the Trustee entered into a certain Settlement Agreement, which was approved by this Court.
2. The terms of the Settlement Agreement, among other things, required Jian to make periodic payments to the Trustee in the total amount of \$237,500.00.
3. Jian has failed to comply with the terms of the Settlement Agreement. The Settlement Agreement requires Jian to pay the sum of \$100,000.00 on May 1, 2024 and the

remaining \$137,500.00 in monthly installments in the amount of \$5,729.17 commencing on June 1, 2024.

4. The Trustee has not received the monthly installment of \$5,729.17 due on July 1, 2024. The failure of Jian to make this payment within five days of its due date renders him in default under the Settlement Agreement.

5. The Trustee provides notice that should Jian fail to cure this default within thirty days of this Notice, eighteen percent (18%) will be added to the settlement payment balance and the Trustee will commence litigation to collect all sums.

Respectfully submitted,

JOLENE E. WEE, TRUSTEE

By Counsel

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By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Plan Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that consistent with Paragraph 18 of the Settlement Agreement, on this 17th day of July, 2024, a copy of the foregoing was delivered by email and first class mail, postage prepaid, to:

Maurice B. VerStandig, Esq.
The Verstandig Law Firm, LLC
9812 Falls Roads, #114-160
Potomac, MD 20854
Email: mac@mbvesq.com

/s/ Dylan G. Trache
Dylan G. Trache